

APPENDIX B. SHPO Concurrence Letter



Arizona Department of Transportation
Intermodal Transportation Division

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February 6, 2004

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RE: Project No. Not Assigned
TRACS No. 040 CN 201 H5106 01E
East Flagstaff TI & Route 66 Pavement and ROW Transfer
Initial Section 106 Consultation
"no adverse effect"

Dear Sirs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a traffic interchange (TI) reconstruction project that includes Interstate 40 (I-40), US Route 89 (US 89), Business 40 (B-40), and State Route (SR) 66 east of the city of Flagstaff, in Coconino County. In addition, the ADOT right-of-way of a 4-mile stretch of SR 66 would be transferred to the City of Flagstaff. Prior to this transfer, FHWA plans to repave SR 66 and add lanes in front of the Flagstaff Mall. As this project would employ federal funds, it is considered an undertaking subject to Section 106 review. This project occurs on ADOT owned land, easement across State Trust lands administered by the Arizona State Land Department (ASLD) and easement across Coconino National Forest (CNF) land. Consulting parties for this project include FHWA, ADOT, the State Historic Preservation Office (SHPO), ASLD, and CNF. Due to the scope and nature of this project, Tribal consultation is not necessary.

As there are two components to this project, this letter will address the East Flagstaff TI project portion first, then the SR 66 pavement and ROW transfer portion of the project. The scope of each portion of the project, site eligibility, and project effect will be discussed separately, as will the cultural resource surveys that have taken place in each portion of the project.

East Flagstaff TI project scope

The scope of the TI reconstruction project would involve widening US 89, reconstructing the US 89/B-40 interchange from a "Y" to a "T", completing the sidewalk system on the north side of US 89, replacing the B-40 overpasses crossing US 89 and the Burlington Northern Santa Fe Railway tracks, and reconstructing the Flagstaff Mall entrance. Geotechnical investigations would be required prior to construction activities. SR 66 between MP 200 and 200.3 may be obliterated or incorporated in an upcoming multi-use pathway for the City of Flagstaff. New ROW is anticipated for this portion of the project. The area of potential effect (APE) for the TI reconstruction project is defined as an irregularly shaped, 168.9-acre parcel measuring 0.8 miles by 1.1 miles that encompasses portions of I-40 (MP 196.9 to 201.4), US 89 (MP 418.07 to 420.7), and SR 66 (MP 200 to 200.8).

East Flagstaff TI previous and current surveys

Portion of APE Surveyed	Reference / Consultant	Sites identified within East Flagstaff TI project	Results of Previous Consultation
I-40, MP 196.9 to 201	Garcia & Johnson 2002 / EcoPlan	None	SHPO concurrence 11/5/02
US 89, MP 418.7 to 420.7	Garcia & Folb 2001 / EcoPlan	None	SHPO concurrence 3/21/01
SR 66, MP 200 to 200.8	Lonardo 2004a / LSD	AZ I:15:156, AZ I:3:10, AZ I:14:334 (ASM)	Report enclosed for review and comment

The portion of the TI that was not previously subjected to cultural resource survey has recently been surveyed by Logan Simpson Design, Inc. (LSD). The results are reported in "*A Cultural Resources Survey of 92.4 Acres at the Intersection of US 89 and I-40, Flagstaff, Coconino County, Arizona*" (Lonardo 2004a), which is enclosed for your review and comment. Three sites, AZ I:15:156 (ASM), AZ I:3:10 (ASM), AZ I:14:334 (ASM) were identified during the survey. Two previously recorded sites, AZ I:14:5 (ASM) (the Beale Wagon Road) and AZ I:14:11 (ASM) (a prehistoric habitation site excavated in 1965), were not relocated during the current survey and appear to have been obliterated within the APE.

East Flagstaff TI sites

Site Number	Site Type	Land Jurisdiction	NRHP Recommendation
AZ I:15:156 (ASM)	Historic Rt. 66 (1922-1947)	ADOT	Eligible, criterion 'd' (non-contributing)
AZ I:15:156 (ASM)	Historic Rt. 66 (1947-1967)	ADOT	Eligible, criterion 'd' (non-contributing)

East Flagstaff TI sites (continued)

Site Number	Site Type	Land Jurisdiction	NRHP Recommendation
AZ I:3:10 (ASM)	Historic US 89	ADOT	Eligible, criterion 'd'
AZ I:14:334 (ASM)	AT&SF Railway	Private	Not evaluated, but treated as eligible

East Flagstaff TI project sites discussion

AZ I:15:156 (ASM) is identified as the historic alignment of US Route 66 (Rt. 66). According to the Interim Procedures for Treatment of Historic Roads (November 15, 2002), Rt. 66 is recognized as part of the Historic State Highway System (SHHS), a structure worthy of programmatic treatment, and is considered one of Arizona's "Crown Jewels." The overall site has been nominated for inclusion in the NRHP under criterion 'a' for its association with the historic context of Transportation and Tourism in northern Arizona, circa 1920-1970, and under criterion 'd' for its potential to yield important information about the development of Arizona's roadways. However, individual segments have been evaluated as either "contributing" or determined to be "non-contributing" elements of the Register-listed property.

Two alignments, the 1922 to 1947 alignment that now follows US 89, and the 1947 to 1967 alignment that is currently SR 66 are within the East Flagstaff TI APE. As the 1922 to 1947 alignment follows that of the historic US 89 alignment, it will be discussed with US 89 below.

The portion of Rt. 66 that falls between MP 200 to 200.8 (Lonardo 2004a) is recommended as a non-contributing element of the Register-eligible property. This segment does not retain any integrity of materials, setting, or feeling. It is surrounded by modern industrial and commercial buildings that have diminished the historic character of the area. The portion of Rt. 66 between MP 200 and 200.3 may be obliterated or incorporated in an upcoming multi-use pathway for the City of Flagstaff. MP 200.3 to 200.8 would be repaved and widened at the Flagstaff Mall as a part of the Rt. 66 pavement and abandonment scope.

AZ I:3:10 (ASM) is identified as the historic alignment of US 89. US 89 is recognized as part of the SHHS, a structure worthy of programmatic treatment. US 89 is recommended as a contributing portion of the Register-eligible site under criterion 'd' for its potential to yield important information about the development of Arizona's roadways. The current US 89 follows both the historic alignment of US 89 and the historic 1922-1947 alignment of Rt. 66. US 89 has removed all traces of the Rt. 66 alignment in the project area. Rt. 66 in this area is considered a non-contributing element. The proposed project would add lanes to US 89, but the integrity of location, function, setting, and feeling of AZ I:3:10 (ASM) would remain intact.

AZ I:14:334 (ASM) is identified as the historic Atchison Topeka and Santa Fe (AT&SF) Railway. This site has not been evaluated for its eligibility for inclusion in the NRHP, but FHWA recommends it be treated as a Register-eligible site. The proposed project would not affect AZ I:14:334 (ASM).

Route 66 pavement and ROW transfer scope

The scope of the SR 66 pavement and ROW transfer project would involve paving the existing SR 66 between MP 200.3 and MP 204, widening SR 66 to five lanes in front of the Flagstaff Mall (MP 200.3 to 200.8), and relinquishing ADOT maintenance duties and ADOT jurisdiction of SR 66 ROW between MP 200 and 204 to the City of Flagstaff. An Intergovernment Agreement (IGA) between ADOT and the City of Flagstaff is in the process of being developed. Results of this consultation will be incorporated in the IGA. No new ROW or temporary construction easements are anticipated for this portion of the project. The APE for the paving and ROW transfer portion of the project consists of the existing SR 66 ROW between MP 200 and 204.

Route 66 Pavement & ROW transfer sites and project treatment

AZ I:15:156 (ASM) / Rt. 66 Mileposts	Reference / Consultant	NRHP Recommendation	Results of Consultation	Project Treatment
MP 200 to 200.3	Lonardo 2004a / LSD	Eligible, criterion 'd' (non-contributing)	Report enclosed for review and comment	May obliterate or incorporate into multi-use pathway
MP 200.3 to 200.8	Lonardo 2004a / LSD	Eligible, criterion 'd' (non-contributing)	Report enclosed for review and comment	Repave with asphalt overlay or crack and seat; widen to 5 lanes
MP 200.8 to 203	Lonardo 2004b / LSD	Eligible, criterion 'd' (non-contributing)	Report enclosed for review and comment	Repave with asphalt overlay or crack and seat
MP 203 to 203.8	Lonardo 2004b / LSD	Eligible, criteria 'a' & 'd' (contributing)	Report enclosed for review and comment	Replacement in kind (concrete)
MP 203.8 to 204	LaFond & Folb 2000	Not recorded	SHPO concurrence 3/28/01	Rebuilt in 2002; no pavement work needed

SR 66, from MP 200.8 to 203.8, has recently been surveyed by LSD. The survey results are reported in "*A Cultural Resource Survey of 73.7 Acres of State Route 66 Right-of-way, Between Mileposts 200.8 and 203.8, Flagstaff, Coconino County, Arizona*" (Lonardo 2004b), and are enclosed here for your review. One site, AZ I:15:156 (ASM), was identified during the survey. Two previously recorded sites, AZ I:14:5 (ASM), the Beale Wagon Road, and AZ I:15:345 (ASM), a historic/modern trash scatter, were not relocated during the survey.

As stated in the East Flagstaff TI project section, the portion of Rt. 66 that falls between MP 200 to 200.8 (Lonardo 2004a) is recommended as a non-contributing element of the Register-eligible property. This segment does not retain any integrity of materials, setting, or feeling. It is surrounded by modern industrial and commercial buildings that have diminished the historic character of the area. The portion of Rt. 66 between MP 200 and 200.3 may be obliterated or incorporated into a multi-use pathway for the City of Flagstaff; MP 200.3 to 200.8 would be repaved and widened to five lanes at the Flagstaff Mall.

Rt. 66 between MP 203 and 203.8 (Lonardo 2004b), is recommended to be a contributing element to the Register-eligible property. The segment retains a concrete road with some asphalt patches and there is little modern development to detract from the historic setting. This segment retains the feeling, setting, location, design, and materials of the historic Rt. 66. ADOT recommends that the portion of Rt. 66 between MP 203 and 203.8 is eligible under criteria 'a' and 'd' and is worthy of preservation. This portion of Rt. 66 would be replaced with concrete, which was the original pavement material used during the construction of Rt. 66.

In order to mitigate any potential adverse effects to Rt. 66 as a result of abandonment to the City of Flagstaff, LSD has thoroughly documented the historic Rt. 66 from MP 200 to 204, including associated road features, as per the "Interim Procedures for the Treatment of Historic Roads" (November 15, 2002). Results of LSD's documentation is reported in "*Report on State Route 66 from US 89 to the Cosnino Overpass for Documentation of the Information Potential Associated with the Historic State Highway System*" (Lonardo 2004c), which is enclosed for your review and comment.

FHWA recognizes that both the East Flagstaff TI and the proposed SR 66 pavement project would alter the historic fabric of the contributing Register-eligible portion of the Rt. 66 roadway. However, due to the level of documentation (report and photographs) for Rt. 66 between MP 200 and 204 and the preservation of the historic setting and feeling from MP 203 to 203.8 through the replacement in kind (concrete), FHWA recommends that the eligible portion of Rt. 66 has been sufficiently mitigated and the proposed project would have no adverse effect on the historic alignment.

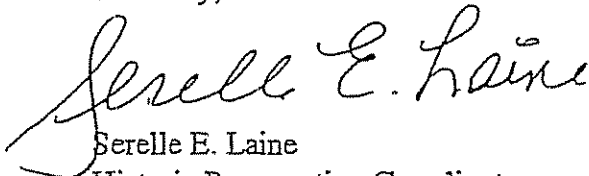
The historic alignment of US 89 is eligible for inclusion in the NRHP under criterion 'd' for its information potential regarding the development of Arizona's roadways. The proposed project

would add lanes to the current US 89, but the integrity of location, function, setting, and feeling of AZ I:3:10 (ASM) would be unaffected.

AZ I:14:334 (ASM), the historic AT&SF Railway, will be treated as a Register-eligible property. The project would replace an overpass above the railroad but would not affect the railroad itself.

Based on the above, FHWA recommends a finding of "no adverse effect" for this project. Please review the enclosed documentation and the information provided in this letter. If you find the report adequate and agree with FHWA's eligibility recommendations and recommendation of project effect, please indicate your concurrence by signing below. FHWA is concurrently consulting CNF and ASLD. As no application for new ROW or temporary construction easements from ASLD are anticipated for this project, ADOT does not expect to receive a response from ASLD for this consultation. However, any responses we receive would be forwarded to your office. As additional information regarding project scope become available, they will be provided to your agency through continued Section 106 consultation. If you have any questions or concerns, please feel free to contact me at 602-712-8636 or e-mail slaine@dot.state.az.us.

Sincerely,



Serelle E. Laine
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Signature for SHPO Concurrence

3/4/04
Date

Enclosures

cc:
Thomas (FHWA)
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SEL:ejd